

**BATHAE DUNNE LLP**  
Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 45965)  
awolinsky@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the  
Advertiser Class*

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Daniel J. Brockwell (CA 335983)  
dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

[Additional counsel on signature page.]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**ADVERTISER PLAINTIFFS’  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS TEMPORARILY UNDER  
SEAL AND NOTICE OF LODGING  
PURSUANT TO CIVIL LOCAL RULE 79-  
5 AND THE COURT’S SEPTEMBER 20,  
2023 ORDER**

Hearing Date: To Be Determined  
Hearing Time: To Be Determined  
Courtroom: 11, 19th Floor

Pursuant to Civil Local Rules 7-11 and 79-5, and the Stipulation and Order Modifying Sealing Procedures Relating to Class Certification Briefing and Related Documents, entered in this action on September 20, 2023 (Dkt. 656), Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick, Mark Berney, 406 Property Services, PLLC, Mark Young, and Katherine Looper submit this administrative motion to file under temporary seal the unredacted versions of Advertiser Plaintiffs' Notice of Motion, Motion for Class Certification, and Memorandum in Support, as well as Exhibits 1-15 to the Lawrence Declaration in their entirety, and Exhibit A to the Williams Declaration in its entirety. Advertiser Plaintiffs file these documents under temporary seal solely because they contain information designated Confidential or Highly Confidential under the Protective Order, not because Advertiser Plaintiffs believe they meet the sealing standard (for nearly all of this information, Advertiser Plaintiffs do *not* believe it meets the sealing standard, and may oppose sealing). Pursuant to the Court's Order (Dkt. 656), the reasons for sealing will be discussed in a forthcoming omnibus sealing motion. Advertiser Plaintiffs also hereby provide notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(e).

Dated: May 24, 2024

**BATHAE DUNNE LLP**

/s/ Yavar Bathae

Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (*pro hac vice*)  
awolinsky@bathaeedunne.com  
Adam Ernette (*pro hac vice*)  
aernette@bathaeedunne.com  
Priscilla Ghita (*pro hac vice*)  
pghita@bathaeedunne.com  
Chang Hahn (*pro hac vice*)  
chahn@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835  
  
Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com

Respectfully submitted,

**SCOTT+SCOTT  
ATTORNEYS AT LAW LLP**

/s/ Amanda F. Lawrence

Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537  
  
Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)

Edward M. Grauman (*pro hac vice*)  
 egrauman@bathaeedunne.com  
 Andrew M. Williamson (CA 344695)  
 awilliamson@bathaeedunne.com  
 901 South MoPac Expressway  
 Barton Oaks Plaza I, Suite 300  
 Austin, TX 78746  
 Tel.: (213) 462-2772

Allison Watson Cross (CA 328596)  
 across@bathaeedunne.com  
 3420 Bristol St., Ste 600  
 Costa Mesa, CA 92626-7133

*Interim Co-Lead Counsel for the  
 Advertiser Classes*

**LEVIN SEDRAN & BERMAN LLP**

Keith J. Verrier (*pro hac vice*)  
 kverrier@lfsblaw.com  
 Austin B. Cohen (*pro hac vice*)  
 acohen@lfsblaw.com  
 510 Walnut Street, Suite 500  
 Philadelphia, PA 19106-3997  
 Tel.: (215) 592-1500  
 Fax: (215) 592-4663

*Members of Executive Committee for the  
 Advertiser Classes*

hcunningham@scott-scott.com  
 Daniel J. Brockwell (CA 335983)  
 dbrockwell@scott-scott.com  
 600 W. Broadway, Suite 3300  
 San Diego, CA 92101  
 Tel.: (619) 233-4565

Patrick J. Rodriguez (*pro hac vice*)  
 prodiguez@scott-scott.com  
 230 Park Avenue, 17th Floor  
 New York, NY 10169  
 Tel.: (212) 223-6444

*Interim Co-Lead Counsel for the  
 Advertiser Classes*

**AHDOOT & WOLFSON, PC**

Tina Wolfson (CA 174806)  
 twolfson@ahdootwolfson.com  
 Robert Ahdoot (CA 172098)  
 rahdoot@ahdootwolfson.com  
 Theodore W. Maya (CA 223242)  
 tmaya@ahdootwolfson.com  
 Henry J. Kelson (*pro hac vice*)  
 hkelston@ahdootwolfson.com  
 2600 West Olive Avenue, Suite 500  
 Burbank, CA 91505  
 Tel.: (310) 474-9111  
 Fax: (310) 474-8585

*Members of Executive Committee for the  
 Advertiser Classes*